

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL		DESCRIPTION (for information only, this does not create any permit requirements)
		1) 10 CSR 10- 5.300: Control of Emissions from Solvent Metal Cleaning	2) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10- 6.060	
CC-STL-01	CC-STL-01A	X	NA	Plantwide cold cleaners greater than 1 gal and 1 ft ² surface area
CC-STL-01	CC-102-01	X	NA	Cold cleaner for hydraulic equipment
CC-STL-01	CC-105-01	NA	#6180	Cold cleaner for electronics only (Moving to 101)
CC-STL-01	CC-221-01	NA	#6114	Cold cleaner for electronics only
CC-101-01	CC-101-03	X	NA	Cold cleaner used for tube cleaning

X = Applicable NA = Not Applicable

COMPLIANCE REQUIREMENTS

I) Federally Enforceable Requirements

Permit Condition EU0040-001
10 CSR 10-5.300 <i>IN SIP so state enf, too</i> Control of Emissions from Solvent Metal Cleaning

Emission Limitations:

- (1) Operating procedures (section (5)(A) Cold Cleaners):
 - (a) Covers shall be closed whenever parts are not being handled in the cleaners, or solvent must drain into an enclosed reservoir.
 - (b) Cleaned parts shall be drained in the free board area for fifteen (15) seconds, or until dripping stops, whichever is longer.
 - (c) Whenever a cold cleaner fails to perform within the operating parameters established by this rule, the unit shall be shut down and secured until trained service personnel are able to restore operation within the established parameters.
 - (d) Solvent leaks shall be repaired immediately, or the degreaser shall be shut down and the leaks secured until they can be more permanently repaired.
 - (e) Waste material removed from a cold cleaner shall be disposed of by one of the methods listed in the rule or equivalent (after the director's approval) and in accordance with 10 CSR 25, as applicable.
 - (f) Waste solvent shall be stored in closed containers only.
- (2) Equipment specifications (section (4)(A) Cold Cleaners):
 - (a) After September 30, 1998 *Permit issued after this date -*
 1. The cold cleaning solvent vapor pressure shall not exceed 2.0 millimeters of Mercury (mmHg) at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)) unless the cold cleaner is used for carburetor cleaning.

2. The cold cleaning solvent vapor pressure shall not exceed 7.0 millimeters of Mercury (mmHg) at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)) for cold cleaners used for carburetor cleaning.

Permit issued after this date
(b) After April 1, 2001

1. The cold cleaning solvent vapor pressure shall not exceed 1.0 millimeters of Mercury (mmHg) at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)) unless the cold cleaner is used for carburetor cleaning.
 2. The cold cleaning solvent vapor pressure shall not exceed 5.0 millimeters of Mercury (mmHg) at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)) for cold cleaners used for carburetor cleaning.
- (c) Exemptions under (4) (A) 3. may apply.
- (d) Alternate methods for reducing cold cleaning emissions may be used if the permittee shows the emission control is at least equivalent to the control in (a) and (b) above and is approved by the director.
- (e) Each cold cleaner will have a cover which will prevent the escape of solvent vapors while in the closed position or enclosed reservoir which will limit the escape of solvent vapors whenever parts are not being processed in the cleaner.
- (f) When one (1) or more of the following conditions exist the design of the cover shall be such that it can easily be operated with one (1) hand and without disturbing the solvent vapors in the tank. (For covers larger than ten (10) square feet, this shall be accomplished by either mechanical assistance or by a power system.)
1. The solvent volatility is greater than 0.3 psi at one hundred degrees Fahrenheit (100°F)
 2. The solvent is agitated.
 3. The solvent is heated.
- (g) A drainage facility allowing parts to drain while the cover is closed is required.
- (h) If an internal drainage facility as in (g) cannot fit into the cleaning system and the solvent volatility is less than 0.6 psi at one hundred degrees Fahrenheit (100°F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath.
- (i) Solvent sprays shall be a solid fluid stream and at a pressure which does not cause splashing above or beyond the freeboard.
- (j) A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment.
- (k) Any cold cleaner which uses a solvent that has a solvent volatility greater than 0.6 psi at one hundred degrees Fahrenheit (100°F) or heated above one hundred twenty degrees Fahrenheit (120°F) must have one (1) of the following control devices:
1. A freeboard ratio of at least 0.75
 2. Water cover (solvent must be insoluble in and heavier than water)
 3. Another control system that has a mass balance demonstrated emission reduction efficiency of at least sixty-five percent (65%) and is approved by the director prior to use.

(3) Operator and Supervisor Training (section (6):

- Paraphrased*
- (a) Persons who operate a cold cleaner shall be trained in the operational and equipment requirements specified in this rule.
 - (b) The supervisor of any person who operates a cold cleaner shall receive equal or greater operational training than the operator.
 - (c) Persons who operate a cold cleaner shall receive refresher training at least once each twelve (12) months.

Record Keeping:

- (1) For cold cleaners subject to a) (2) (a) or (b) the following records for each sale of cold cleaning solvent shall be maintained and retained for two (2) years:
 - (a) The name and address of the solvent supplier
 - (b) The date of purchase
 - (c) The type of solvent
 - (d) The vapor pressure of the solvent in mmHg at 20°C (68°F)
 - (2) A record shall be kept of the cold cleaner training for each employee and shall be retained for two (2) years.
 - (3) Monthly records of the following shall be kept for a period of two (2) years:
 - (a) Solvent types and amount purchased
 - (b) Types and amounts of solvent containing waste material:
 - 1. Transferred to a contract reclamation service or disposal facility
 - 2. Distilled on the premises
 - (c) Maintenance and repair logs for the cold cleaner and any associated control equipment
- gen'l condition
any record
has to be kept
for 5 yrs
yrs*

Monitoring:

None

Reporting:

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of the vapor pressure limit set under Emission Limitations (2) in 10 CSR 10-5.300.

Permit Condition EU0040-002

10 CSR 10-6.060

Air Construction Permits

1) Requirements of Construction Permit Number: #6180 (Parts Cleaner for Electronic Parts)

Emission Limitations:

Solvents are limited to N-methyl pyrrolidone or an aliphatic hydrocarbon which has been pre-approved by the St. Louis County Air Pollution Control Program Manager (such as Axarel 2200 or Micropure CDF).

Record Keeping:

Maintain monthly records showing by type of solvent the volume and weight of each material added to the unit.

Monitoring:

None

Reporting:

None

2) Requirements from Construction Permit Number: #6114 (Parts Cleaner for Electronic Parts)

Emission Limitations:

The operation is limited to 5,500 pounds of solvent on a twelve (12) month rolling average.

Record Keeping:

Maintain monthly records showing the volume and weight of each material added to the unit and the twelve (12) month rolling average.

Monitoring:

None

Reporting:

If the Record Keeping Requirements show that the Emission Limitations have been exceeded, St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, shall be notified by the next working day.

This notification is not required to be certified by a responsible official.

why not?

EU0050

Spray Gun Cleaning Operations

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL		DESCRIPTION (for information only, this does not create any permit requirements)
		1) 10 CSR 10-5.300: Control of Emissions from Solvent Metal Cleaning	2) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP - Spray Gun Cleaning Operations	
BF-STL-02	CC-STL-01B	NA	X	Plantwide spray gun cleaning

X = Applicable NA = Not Applicable

COMPLIANCE REQUIREMENTS

I) **Federally Enforceable Requirements**

Permit Condition EU0050-001

10 CSR 10-6.075 and 40 CFR Part 63, Subpart GG

Aerospace Manufacturing and Rework Facilities NESHAP - Spray Gun Cleaning

Emission Limitations:

(1) Housekeeping measures

- why is this in spray gun cleaning?
- (a) Operators shall place aerospace production cleaning solvent-laden cloth, paper, or other absorbent applicators used for cleaning in closed containers (such as plastic bags or step cans with the lids down) before leaving their work area. Ensure that these bags and containers are kept closed at all times except when depositing or removing these materials from the container. Use bags and containers of such design so as to contain the vapors of the cleaning solvent. Cotton-tipped swabs used for very small cleaning operations are exempt from this requirement.
 - (b) Store fresh and spent cleaning solvents, except semi-aqueous solvent cleaners, used in aerospace cleaning operations in closed containers (such as flip-top or squirt bottles with small openings, safety cans or drums with closed bungs).
 - (c) Conduct the handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or spent cleaning solvents in such a manner that minimizes spills.

(2) Spray gun cleaning

- 63.744 (c) ok
- (a) Each owner or operator of a new or existing spray gun cleaning operation shall use one or more of the techniques, or their equivalent, specified in this section. Spray gun cleaning operations using cleaning solvent solutions that contain HAP and VOC below de minimis levels specified in 63.741 (f) are exempt from these requirements.
 - 1. Enclosed Systems. Clean the spray gun in an enclosed system that is closed at all times except when inserting or removing the spray gun. Cleaning shall consist of forcing the cleaning solvent through the gun. If leaks are found during the monthly inspection required in 63.751 (a), repairs shall be made as soon as practicable, but no later than 15 days after the leak was found. If the leak is not repaired by the 15th day after detection, the cleaning solvent shall be removed and the enclosed cleaner shall be shut down until the leak is repaired or its use is permanently discontinued.
 - 2. Nonatomized cleaning. Clean the spray gun by placing cleaning solvent in the pressure pot and forcing it through the gun with the atomizing cap in place. No atomizing air is to be used. Direct the cleaning solvent from the spray gun into a vat, drum, or other waste container that is closed when not in use.
 - 3. Disassembled spray gun cleaning. Disassemble the spray gun and clean the components in a vat, which shall remain closed at all times except when in use. Alternatively, soak the components in a vat, which shall
- (c)(2) ok
- (c)(3)
- (by hand)

remain closed during the soaking period and when not inserting or removing components.

4. Atomizing cleaning. Clean the spray gun by forcing the cleaning solvent through the gun and direct the resulting atomized spray into a waste container that is fitted with a device designed to capture the atomized cleaning solvent emissions.

Record Keeping:

- (1) A record of all leaks from enclosed spray gun cleaners that includes for each leak found:
- (a) Source identification
 - (b) Date leak was discovered
 - (c) Date leak was repaired
- (2) Each owner or operator using an enclosed spray gun cleaner shall keep records of the visual inspections. *Retention time?*

Monitoring:

- ok* (1) Each owner or operator using an enclosed spray gun cleaner shall visually inspect the seals and all other potential sources of leaks associated with each enclosed spray gun cleaner system at least once per month. Each inspection shall occur while the system is in operation.

Reporting:

- (1) Each owner or operator of a cleaning operation shall submit the following information:
- (a) Semiannual reports occurring every six (6) months.
 - (b) If the operations have been in compliance for the semiannual period, a statement that the cleaning operations have been in compliance with the applicable standards.

what has to be in this report?
SEE 63.753
(b)(1)(iii)
+
(iv)

NOTES TIPS?
63.744
(c)(5)

EU0060
Coating Lines

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL				STATE/ LOCAL ONLY	DESCRIPTION (for information only, this does not create any permit requirements)
		1) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP - Primers and Topcoats	2) 10 CSR 10-5.050: Restriction of Emission of Particulate Matter from Industrial Processes	3) 10 CSR 10-5.330: Control of Emissions from Industrial Surface Coating Operations	4) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	1) 10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework Facilities	
CL-002-01	SB-002-01	X	X	NA	#1780	X	Large spray booth (production parts)
AS-STL-01	SB-002-04	NA	NA	NA	NA	X	Booth for various activities (adhesive/sealant)
CL-002-02	SB-002-06	NA	X	NA	NA	NA	Spray booth (maintenance) (sanding)
CL-027-01	SB-027-01	X	X	NA	NA	X	Paint booth (mostly production) (some sanding)
CL-027-01	SB-027-02	X	X	NA	NA	X	Paint booth (mostly production) (some sanding)
CL-027-01	SB-027-03	X	X	NA	NA	X	Paint booth (mostly production) (some sanding)
CL-027-01	SB-027-04	X	X	NA	NA	X	Paint booth (mostly production) (some sanding)
CL-027-01	SB-027-05	X	X	NA	NA	X	Paint booth (mostly production) (some sanding)
CL-029-01	SB-029-01	X	X	NA	#6259	X	Adhesive bonding coating line
CL-029-02	SB-029A-02	X	X	NA	#5739	X	Spray booth (mostly QA/QC) (possible production)
CL-048-01	SB-048-01	X	X	NA	#3221	X	Paint booth (aerospace production)
CL-048-01	SB-048-02	X	X	NA	#3275	X	Paint booth (aerospace production)

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CL-048-01	SB-048-03	X	X	NA	#3276	X	Paint booth (aerospace production)
CL-048-01	SB-048-04	X	X	NA	#3277	X	Paint booth (aerospace production)
CL-048-01	SB-048-05	X	X	NA	#6324	X	Paint booth (aerospace production)
CL-048-01	SB-048-06	X	X	NA	#6447	X	Paint booth (aerospace production)
CL-060-01	SB-060-01	NA	X	NA	NA	NA	Spray booth (cans of primer) (research and development)
CL-063-01	SB-063-01	X	X	NA	#1490	X	Spray booth (paint & others) (aerospace production)
CL-066-01	SB-066-01	X	X	NA	#1369	X	Spray booth (aerospace production) (painting and sanding)
CL-066-01	SB-066-02	NA	X	NA	#1366	NA	Spray booth (research and development)
CL-101-01	SB-101-25	X	X	NA	NA	X	Spray booth (aerospace production) (painting and sanding)
CL-101-01	SB-101-26	X	X	NA	NA	X	Spray booth (aerospace production) (painting and sanding)

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CL-101-01	SB-101-27	X	X 6.400	NA	NA	X	Spray booth (aerospace production) (painting and sanding)
AS-STL-01	SB-101-29	NA	NA	NA	#1624	X	Spray booth (sealants and adhesives)
CL-101-01	SB-101-30	X	X	NA	NA	X	Spray booth (aerospace production) (painting and sanding)
CL-101-01	SB-101-39	X	X	NA	NA	X	Spray booth (aerospace production) (painting and sanding)
CL-101-01	SB-101-44	NA	NA	NA	NA	NA	Spray booth (developers: ex: KPR Resist) (not primer or topcoat)
CL-101-02	SB-101-02	X	X	NA	#1754	X	Spray booth (aerospace production) (painting and sanding)
CL-101-02	SB-101-33	X	X	NA	NA	X	Spray booth (aerospace production) (painting and sanding)
CL-101-02	SB-101-40	X	X	NA	NA	X	Spray booth (aerospace production) (painting and sanding)

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL				STATE/ LOCAL ONLY	DESCRIPTION (for information only, this does not create any permit requirements)
		1) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAAP - Primers and Topcoats	2) 10 CSR 10-5.050: Restriction of Emission of Particulate Matter from Industrial Processes	3) 10 CSR 10-5.330: Control of Emissions From Industrial Surface Coating Operations	4) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	1) 10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework Facilities	
CL-101-02	SB-101-40A	X	X	NA	NA	X	Spray booth (aerospace production) (painting and sanding)
CL-101-03	SB-101-04	NA	X	NA	#5988	NA	Spray booth (research and development)
CL-101-03	SB-101-41	X	X	NA	#1621	X	Spray booth (research and development) (could be used for production)
CL-101-03	SB-101-06	X	X	NA	#1473	X	Spray booth (mock-up & tooling) (could be used for production)
CL-101-03	SB-101-43	NA	X	NA	#1474	NA	Spray booth (robotic & hand applied) (research and development)
CL-101-03	SB-101-35	X	X	NA	#1475	X	Spray booth (robotic & hand applied) (research and development) (could be used for production)
CL-101-03	SB-101-45	NA	X	NA	#6208	NA	Robotic Sprayer (research and development)
CL-102-01	SB-102-01	NA	X	NA	#1207	NA	Bench spray booth (research & development)
CL-102-01	SB-102-03	X	X	NA	#1042	X	Paint booth (aerospace) (mostly research and development) (some aerospace production)

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		1) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP - Primers and Topcoats	2) 10 CSR 10-5.050: Restriction of Emission of Particulate Matter from Industrial Processes	3) 10 CSR 10-5.330: Control of Emissions From Industrial Surface Coating Operations	4) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	1) 10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework Facilities	
CL-245-02	SB-245-02	NA	X	NA	#1709	NA	Paint booth (maintenance)
CL-248-01	SB-248-01	NA	X	NA	#1753	NA	Paint booth (mock-up) (research and development)
NONE	SB-101-10	NA	X	NA	#1668	NA	Spray Booth (Plasma spray coater) (research and development)
NONE	SB-101-34	NA	X	NA	NA	NA	Spray booth (Arc Spray)

X = Applicable NA = Not Applicable

COMPLIANCE REQUIREMENTS

I) Federally Enforceable Requirements

COATING LINES

Permit Condition EU0060-001

10 CSR 10-6.075 and 40 CFR Part 63, Subpart GG

Aerospace Manufacturing and Rework facilities NESHAP - Primers and Topcoats

Emission Limitations:

uncontrolled

(1) Primers:

- (a) shall be limited to a VOC content of 350 grams per liter or 2.9 pounds per gallon (VOC content is measured less water and exempt solvent) as applied.
- (b) shall be limited to an organic HAP content of 350 grams per liter or 2.9 pounds per gallon (organic HAP content is measured less water and exempt solvent) as applied.
- (c) The VOC content may be used as a surrogate for the organic HAP content.

(2) Topcoats:

- (a) shall be limited to a VOC content of 420 grams per liter or 3.5 pounds per gallon (VOC content is measured less water and exempt solvent) as applied.
- (b) shall be limited to a organic HAP content of 420 grams per liter or 3.5 pounds per gallon (organic HAP content is measured less water and exempt solvent) as applied.
- (c) The VOC content may be used as a surrogate for the organic HAP content.

63.745 (c)(2)
63.745 (c)(2)

- 745 (a)
- SEE 63.750 (a)
- (3) Averaging (as described in 63.745(e) (2) & 750 (d)) can be used to meet the Primer and Topcoat limits. *Applies only to uncontrolled by*
- (4) Inorganic HAP Control. The airflow shall be exhausted through a dry particulate filter system that meets the limits in 40 CFR 63.745 (g) by Method 319 when primers or topcoats containing inorganic HAPs are being sprayed.
- (5) The usage of specialty coatings as defined in 40 CFR 63 Subpart GG are not covered by this rule.
- (6) Work practice standards
- 63.745 (b) (a) Primers and topcoats shall be handled in a manner to minimize spills. *transferred*
- (b) Primers and topcoats shall be applied in a manner consistent with the requirements of this rule.

Record Keeping:

(1) Primers and Topcoats

- 63.752 (c) (4) (a) Record the name and VOC content as applied of each primer and topcoat used in production areas. *at the facility*
- (b) For low HAP content primers and topcoats record keeping complying with 63.752 (c)(3) may be used. *(annual purchase records, all data, calc etc)*
- (c) If averaging is used to meet the primer and topcoat limits record keeping shall comply with 63.752 (c)(4).

(2) Inorganic HAP Control

- (a) Record the pressure drop (either electronically or manually) once each operating shift that inorganic HAP containing primer or topcoat is spray applied.
1. The pressure drop records are deemed to be complete if 95% of the readings are recorded for all of the booths subject to this rule in any six (6) month period. If the last reading recorded correctly prior to any group of missed readings and the first reading recorded correctly after the same group of missed readings are both below the pressure drop limit, the missed readings are deemed to be below the pressure drop limit.
2. For this provision, a shift is an 8 hour period (12:00 midnight to 8:00 AM, 8:00 AM to 4:00 PM, and 4:00 PM to 12:00 midnight).

Monitoring:

- (1) For dry filters, install differential pressure gauge across filter bank. Continuously monitor the pressure drop when inorganic HAP containing primers and topcoats are spray applied and take corrective action if pressure drop falls outside the manufacturer's limits.

Reporting:

(1) Every six (6) months:

- (a) Report all times when a primer or topcoat application containing inorganic HAP was not immediately shut down when the pressure drop across a dry particulate filter was outside limit(s) as specified by the filter or booth manufacturer.
- (b) Report any times where primers or topcoats exceeded the appropriate VOC or organic HAP limit.

- (c) If the operations have been in compliance for the semiannual period, (provide) a statement that the operations have been in compliance with the applicable standards.
- (2) Annually: (Report) the number of times the pressure drop was outside the limit(s) as specified by the filter or booth manufacturer.

Permit Condition EU0060-002

10 CSR 10-5.050

Restriction of Emission of Particulate Matter from Industrial Processes

Emission Limitations:

No person shall cause, suffer, allow or permit the emission of particulate matter in any one (1) hour to exceed the concentration shown in Table II of the rule for the process weight rate associated with that source.

Record Keeping:

The one-time compliance calculation based on the particulate concentration of particulates being emitted from each booth must be kept as a record.

Monitoring:

None

Reporting:

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of particulate emission limits required by Emission Limitations.

Permit Condition EU0060-003

10 CSR 10-6.060

Air Construction Permits

- 1) Requirements of the Construction Permit Numbers: #'s 1490, 1624, 1621, 1473, 1474, 1475, 1207, 1042, 1709, 1668

Emission Limitations:

None

Record Keeping:

None

Monitoring:

None

Reporting:

None

- 2) Requirements of the Construction Permit Number: #1780 (Large Parts Paint Booth - Operating Permit #5771)

Emission Limitations:

Booth is limited to seven thousand (7,000) gallons of aerospace topcoats, primers and specialty coatings per twelve (12) month rolling period.

Record Keeping:

- (a) Monthly records of gallons of aerospace topcoats, primers and specialty coating used in this booth that demonstrate compliance with the above emission limitation.
- (b) Records that show compliance with 10-5.330.
- (c) Records that show the twelve (12) month rolling average of gallons of aerospace topcoats, primers and specialty coatings used.
- (d) Records shall be maintained for a period of five (5) years.
- (e) Records shall be made available to St. Louis County Air Pollution Control Program Manager upon request.

Monitoring:

None

Reporting:

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of the gallon limit under Emission Limitations.

3) Requirements of the Construction Permit Number: #6259 (Paint and Adhesive Booth)

Emission Limitations:

VOC and HAP emissions are limited to 1.75 tons per year from aerospace topcoats, primers and specialty coatings on a 12 month rolling average.

Record Keeping:

- (a) Permittee shall maintain monthly records of aerospace topcoats, primers and specialty coatings usage and VOC and HAP content per gallon, on site, for the latest twenty-four (24) month period, which clearly demonstrates compliance with the Emission Limitation above.
- (b) Records shall be complete within ten (10) days of the end of each month.

Monitoring:

None

Reporting:

If the records indicate that a violation of the emission limitation or standards of this permit has occurred, the permittee shall notify the St. Louis County Department of Health Air Pollution Control Program Manager by no later than the next working day. This notification is not required to be certified by a responsible official.

4) Requirements of the Construction Permit Number: #5739 (Paint Spray Booth)

Emission Limitations:

Emissions of VOC and HAP from aerospace topcoats, primers and specialty coatings are limited to three and two tenths (3.2) tons per year on a twelve month (12) rolling average.

Record Keeping:

- (1) Monthly records must be maintained that meet the following requirements:
 - (a) Demonstrate the status of compliance with the above emission limitation.
 - (b) Records must be complete within ten (10) days of the end of each month.
 - (c) Records that indicate the per twelve (12) month rolling average of VOC and HAP emissions from the aerospace topcoats, primers and specialty coatings used.
 - (d) Records must be maintained for the latest sixty (60) month period.

Monitoring:

None

Reporting:

exceedance
Should records indicate a violation of the above emission limitation, 10 CSR 10-5.330, or 40 CFR Part 63, subpart GG has occurred, the permittee shall notify the St. Louis County Department of Health Air Pollution Control Program Manager by no later than the next working day.

This notification is not required to be certified by a responsible official.

5) Requirements of the Construction Permit Number: #'s 3221, 3275, 3276, 3277, 6324, 6447 (Building 48 Spray Paint Booth)

Emission Limitations:

- (1) Emissions of VOCs from aerospace topcoats, primers and specialty coatings are limited to less than eighteen (18) tons per year, on a twelve month rolling average.
- (2) Emissions of any individual HAP from aerospace topcoats, primers and specialty coatings are limited to less than ten (10) tons per year, on a twelve month rolling average.
- (3) Emissions of any combination of HAPs from aerospace topcoats, primers and specialty coatings are limited to less than eighteen (18) tons per year, on a twelve month rolling average.

Record Keeping:

- (1) Monthly and per twelve (12) month rolling period records of all aerospace topcoats, primers and specialty coatings utilized in the paint booths shall be maintained. These records shall include:
 - (a) The amounts utilized.
 - (b) The VOC and HAP(s) content of each material.
 - (c) Monthly calculations which demonstrate compliance with the limits established in the above Emissions Limitations.
 - (d) Records must be maintained for the latest sixty (60) month period.

Monitoring:

None

Reporting:

Should the records indicate that a violation of any limit established in the above Emission Limitations has occurred, the permittee shall notify the St. Louis County Department of Health Air Pollution Control Program Manager by no later than the next working day.

This notification is not required to be certified by a responsible official.

6) Requirements of the Construction Permit Number: #1366 (Operating Permit #5331 Special Project Lab - Spray Paint Booth)

Emission Limitations:

Unit is limited to 0.62 tons VOC emitted from topcoats, primers and specialty coatings per year or 2,080 hours of operation per twelve (12) month rolling average.

Record Keeping:

(1) Monthly and per twelve (12) month rolling period records of all aerospace topcoats, primers and specialty coatings utilized in the paint booths shall be maintained.

These records shall include:

- (a) The amounts utilized.
- (b) The VOC content of each material.
- (c) Monthly calculations which demonstrate compliance with the limits established in the above Emissions Limitations.
- (d) Records must be maintained for the latest sixty (60) month period.

Monitoring:

None

Reporting:

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of the VOC limit required by Emission Limitations.

7) Requirements of the Construction Permit Number: #1369 (Spray Paint Booth Building 66 - Operating Permit # 5368)

Emission Limitations:

Unit is limited to 2 tons VOC emitted from topcoats, primers and specialty coatings per year or 2,080 hours of operation per twelve (12) month rolling period.

Record Keeping:

(1) Monthly and per twelve (12) month rolling period records of all aerospace topcoats, primers and specialty coatings utilized in the paint booths shall be maintained.

These records shall include:

- (a) The amounts utilized.
- (b) The VOC and HAP(s) content of each material.
- (c) Monthly calculations which demonstrate compliance with the limits established in the above Emissions Limitations.
- (d) Records must be maintained for the latest sixty (60) month period.

Monitoring:

None

Reporting:

The permittee shall report to the St. Louis County Department of Health Air Pollution Control Section, 111 South Meramec, Clayton, MO, 63105 no later than thirty (30)

days after the discovery of any **exceedance** of the VOC limit required by Emission Limitations.

8) Requirements of the Construction Permit Number: #1754 (Paint Spray Booth Building- Operating Permit #5737)

Emission Limitations:

Unit is limited to 12.5 tons VOC emitted from topcoats, primers and specialty coatings per year or 2,000 hours of operation per twelve (12) month rolling period.

Record Keeping:

(1) Monthly and per twelve (12) month rolling period records of all aerospace topcoats, primers and specialty coatings utilized in the paint booths shall be maintained.

These records shall include:

- (a) The amounts utilized.
- (b) The VOC content of each material.
- (c) Monthly calculations which demonstrate compliance with the limits established in the above Emissions Limitations.
- (d) Records must be maintained for the latest sixty (60) month period.

Monitoring:

None

Reporting:

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than **thirty (30)** days after the discovery of any **exceedance** of the VOC limit required by Emission Limitations.

9) Requirements of the Construction Permit Number: #5988 (Paint Spray Booth)

Emission Limitations:

Topcoats, primers and specialty coatings usage is limited to 2,000 gallons per twelve (12) month rolling period.

Record Keeping:

(1) Monthly and per twelve (12) month rolling period records of all aerospace topcoats, primers and specialty coatings utilized in the paint booths shall be maintained.

These records shall include:

- (a) The amounts utilized.
- (b) The VOC and HAP(s) content of each material.
- (c) Monthly calculations which demonstrate compliance with the limits established in the above Emissions Limitations.
- (d) Records must be maintained for the latest sixty (60) month period.

Monitoring:

None

Reporting:

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of the topcoats, primers and specialty coatings usage limit required by Emission Limitations.

10) Requirements of the Construction Permit Number: #6208 (Robotic Paint Spray Booth)

Emission Limitations:

Topcoats, primers and specialty coatings usage is limited to 39,990 pounds of VOC emitted per year, on a twelve (12) month rolling average.

Record Keeping:

- (1) Recordkeeping to show daily compliance with 10 CSR 10-5.330.
 - (a) Monthly records of topcoats, primers and specialty coatings usage and VOC content, as well as the twelve (12) month rolling average shall be maintained on site.
 - (b) Monthly records shall be made available to St. Louis County Program Manager or his designated agent at any reasonable time.

Monitoring:

None

Reporting:

Should records indicate that a violation of 10 CSR 10-5.330, or the Emission Limitation above has occurred, the permittee must notify St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, by no later than the next working day.

This notification is not required to be certified by a responsible official.

11) Construction Permit Number: #1753 (Large Paint Spray Booth Building 248 - Operating Permit # 5741)

Emission Limitations:

This unit is limited to 4.6 tons of VOC emissions from topcoat, primer and specialty coating emissions per year or 2,000 hours of operation twelve (12) month rolling period.

Record Keeping:

- (1) Monthly and per twelve (12) month rolling period records of all aerospace topcoats, primers and specialty coatings utilized in the paint booths shall be maintained. These records shall include:
 - (a) The amounts utilized.
 - (b) The VOC content of each material.
 - (c) Monthly calculations which demonstrate compliance with the limits established in the above Emissions Limitations.
 - (d) Records must be maintained for the latest sixty (60) month period.

Monitoring:

None

Reporting:

The permittee shall report to the St. Louis County Department of Health Air Pollution Control Section, 111 South Meramec, Clayton, MO, 63105 no later than ~~thirty~~ (30) days after the discovery of any exceedance of VOC limit required by Emission Limitations. 10

II) State/Local Only Enforceable Requirements

Permit Condition EU0060-004

10 CSR 10-5.295

Control of Emissions From Aerospace Manufacture and Rework Facilities
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Emission Limitations:

- (1) Specialty coatings shall be limited to VOC contents expressed in Table I of this rule. (See appendix 1)
- (2) Primers shall be limited to a VOC content of 350 grams per liter or 2.9 pounds per gallon (VOC content is measured less water and exempt solvent) as applied.
- (3) Topcoats shall be limited to a VOC content of 420 grams per liter or 3.5 pounds per gallon (VOC content is measured less water and exempt solvent) as applied.

Record Keeping:

- (1) The permittee shall maintain a list of coatings in use with category and VOC content as applied.
- (2) The permittee shall record coating usage on a monthly basis.
- (3) The permittee shall maintain records of monthly volume-weighted average VOC content for each regulated coating type included in averaging for coating operations that achieve compliance through coating averaging under this rule.

Monitoring:

None

Reporting:

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after discovery that the VOC content limit set in Emission Limitations.

has been exceeded.

EU0070

Coating Lines Alternate Operating Scenario A

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL				STATE	DESCRIPTION (for information only, this does not create any permit requirements)
		1) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP - Primers and Topcoats	2) 10 CSR 10-5-050: Restriction of Emission of Particulate Matter from Industrial Processes	3) 10 CSR 10-5-330: Control of Emissions From Industrial Surface Coating Operations	4) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	1) 10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework Facilities	
CL-002-02	SB-002-06	X	X	NA	NA	X	Spray booth (maintenance) (sanding)
CL-060-01	SB-060-01	X	X	NA	NA	X	Spray booth (cans of primer) (research and development)
CL-066-01	SB-066-02	X	X	NA	#1366	X	Spray booth (research and development)
AS-STL-01	SB-101-29	X	X	NA	#1624	X	Spray booth (sealants and adhesives)
CL-101-01	SB-101-03	X	X	NA	NA	X	Lab hood for conformal coating of parts
CL-101-01	SB-101-44	X	X	NA	NA	X	Spray booth (developers: ex: KPR Resist) (not primer or topcoat)
CL-101-03	SB-101-04	X	X	NA	#5988	X	Spray booth (research and development)
CL-101-03	SB-101-43	X	X	NA	#1474	X	Spray booth (robotic & hand applied) (research and development)
CL-101-03	SB-101-45	X	X	NA	#6208	X	Robotic sprayer (research and development)
CL-102-01	SB-102-01	X	X	NA	#1207	X	Bench spray booth (research & development)
CL-245-02	SB-245-02	X	X	NA	#1709	X	Paint booth (maintenance)
CL-248-01	SB-248-01	X	X	NA	#1753	X	Paint booth (mock-up) (research and development)
NONE	SB-101-10	X	X	NA	#1668	X	Spray booth (Plasma spray coater) (research and development)
NONE	SB-101-34	X	X	NA	NA	X	Spray booth (arc spray)

X = Applicable NA = Not Applicable

stet

DESCRIPTION OF ALTERNATE SCENARIO

This alternate scenario allows these booths to be used for spray coating application of production parts with aerospace primers, topcoats and specialty coatings. These booths are currently used for an activity that is exempt from some or all of the requirements associated with aerospace production booths such as research and development, maintenance, or arc spray. The coating of aerospace production parts in any of these booths with aerospace primers, topcoats, and specialty coatings will subject these booths to the applicable requirements listed above.

COMPLIANCE REQUIREMENTS

Applicable requirements are the same as listed above under Coating Lines.

EU0080 Fugitive Painting					
		FEDERAL	STATE		DESCRIPTION (for information only, this does not create any permit requirements)
EIG POINT NUMBER	EMISSION UNIT NUMBER	1) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP - Primers and Topcoats	2) 10 CSR 10-5.330: Control of Emissions from Industrial Surface Coating Operations	1) 10 CSR 10-5.295: Control of Emissions From Aerospace Manufacturing and Rework Facilities	
BF-STL-01	BF-STL-01	X	NA	X	Plantwide Fugitive Painting

X = Applicable NA = Not Applicable

COMPLIANCE REQUIREMENTS

I) Federally Enforceable Requirements

Permit Condition EU0080-001
10 CSR 10-6.075 and 40 CFR Part 63, Subpart GG Aerospace Manufacturing and Rework facilities NESHAP - Primers and Topcoats
Emission Limitations:

(1) Primers:

- shall be limited to a VOC content of 350 grams per liter or 2.9 pounds per gallon (VOC content is measured less water and exempt solvent) as applied.
- shall be limited to an organic HAP content of 350 grams per liter or 2.9 pounds per gallon (organic HAP content is measured less water and exempt solvent) as applied.
- The VOC content may be used as a surrogate for the organic HAP content.

(2) Topcoats:

- (a) shall be limited to a VOC content of 420 grams per liter or 3.5 pounds per gallon (VOC content is measured less water and exempt solvent) as applied.
- (b) shall be limited to a organic HAP content of 420 grams per liter or 3.5 pounds per gallon (organic HAP content is measured less water and exempt solvent) as applied.
- (c) The VOC content may be used as a surrogate for the organic HAP content.
- (3) Averaging (as described in 63.745(e) (2) & 750 (d)) can be used to meet the Primer and Topcoat limits.
- (4) The usage of specialty coatings as defined in 40 CFR 63 Subpart GG is not covered by this rule.
- (5) Areas where it is not technically feasible to paint parts in a booth are not required to meet particulate control requirements of 63.745 (g)(1) through (g)(3). In addition to the exceptions listed in 63.745 (g)(i) through (g)(viii), the following operations are not feasible within a paint booth:
 - (a) The part is too large to be painted in a booth.
 - (b) The coatings are not spray applied.
 - (c) The part would need to be removed from a fixture/tool to be painted in a booth.
 - (d) Cycle time restrictions prior to subsequent operations make it time prohibitive to move the part to a paint booth.
 - (e) Other operations where engineering analysis recommends the part be painted outside of a booth.

Record-Keeping:

- § 63.752(c) received and at the facility.*
- (1) Record the name and VOC content as applied of each primer and topcoat used in production areas.
 - (1) For low HAP content primers and topcoats record keeping complying with 63.752 (c)(3) may be used.
 - (2) If averaging is used to meet the primer and topcoat limits record keeping shall comply with 63.752(c)(4).

Monitoring:

None

Reporting:

- Deviations must be reported in 10 days*
- (1) Every six (6) months:
 - (a) Report any times where primers or topcoats **exceeded** the appropriate VOC or organic HAP limit.
 - (b) If **the operations have been in compliance for the semiannual period**, (provide) a statement that the operations have been in compliance with the applicable standards.
- what if they haven't?*

II) State/Local Only Enforceable Requirements

Permit Condition EU0080-002

10 CSR 10-5.295

Control of Emissions From Aerospace Manufacturing and Rework Facilities

Emission Limitations:

- (1) Specialty coatings shall be limited to a VOC content as expressed in Table I of this rule. (See Appendix 1)
- (2) Primers shall be limited to a VOC content of 350 grams per liter or 2.9 pounds per gallon (VOC content is measured less water and exempt solvent) as applied.
- (3) Topcoats shall be limited to a VOC content of 420 grams per liter or 3.5 pounds per gallon (VOC content is measured less water and exempt solvent) as applied.

Record Keeping:

- (1) The permittee shall maintain a list of coatings in use with category and VOC content as applied.
- (2) The permittee shall record coating usage on a monthly basis.
- (3) The permittee shall maintain records of monthly volume-weighted average VOC content for each regulated coating type included in averaging for coating operations that achieve compliance through coating averaging under this rule.

Monitoring:

None

Reporting:

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than **thirty (30) days** after the discovery of any **exceedance** of Emission Limitations.

EU0090

Combustion Sources

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL			DESCRIPTION (for information only, this does not create any permit requirements)
		1) 40 CFR Part 60 Subpart Dc and 10 CSR 10-6.070: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	2) 10 CSR 10-5.060: Refuse Not to be Burned in Fuel Burning Installations	3) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	
CS-005-01	CS-005-02	NA	X	#1321	Coal/natural gas/fuel oil boiler (76.4 MMBTU/hr)
CS-005-01	CS-005-03	NA	X	#1321	Coal/natural gas/fuel oil boiler (76.4 MMBTU/hr)
CS-005-01	CS-005-04	NA	X	#1321	Coal/natural gas/fuel oil boiler (76.4 MMBTU/hr)
CS-005-05	CS-005-05	NA	X	NA	Natural gas/fuel oil boiler (77.0 MMBTU/hr)
CS-048-01	CS-048-01	X	X	#6358	Natural gas boiler (25.1 MMBTU/hr)

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL			DESCRIPTION (for information only, this does not create any permit requirements)
		1) 40 CFR Part 60 Subpart Dc and 10 CSR 10-6.070: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	2) 10 CSR 10-5.060: Refuse Not to be Burned in Fuel Burning Installations	3) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	
CS-101-01	CS-101-01	NA	X	NA	Natural gas boiler (52.0 MMBTU/hr)
CS-101-01	CS-101-02	NA	X	NA	Natural gas boiler (52.0 MMBTU/hr)
CS-101-03	CS-101-03	NA	X	NA	Natural gas boiler (20.8 MMBTU/hr)
CS-101-03	CS-101-04	NA	X	NA	Natural gas boiler (20.8 MMBTU/hr)
CS-102-01	CS-102-01	NA	X	NA	Natural gas boiler (79.6 MMBTU/hr)
CS-102-02	CS-102-02	NA	X	NA	Natural gas boiler (33.476 MMBTU/hr)
CS-102-02	CS-102-03	NA	X	NA	Natural gas boiler (25.2 MMBTU/hr)
CS-110-01	CS-110-01	NA	X	#0865	Natural gas boiler (10.461 MMBTU/hr)
CS-110-01	CS-110-02	NA	X	#0865	Natural gas boiler (10.461 MMBTU/hr)
CS-111-01	CS-111-01	NA	X	#1332	Natural gas boiler (16.8 MMBTU/hr)
CS-111-01	CS-111-02	NA	X	#1332	Natural gas boiler (16.8 MMBTU/hr)
CS-STL-01	CS-STL-01A	NA	X	NA	Plantwide combustion (indirect natural gas)
CS-STL-01	CS-STL-01C	NA	X	NA	Plantwide combustion (propane)
CS-STL-01	CS-025-01	NA	X	NA	Natural gas boiler (8.5 MMBTU/hr)
CS-STL-01	CS-066-01	NA	X	NA	Natural gas boiler/FO back-up (6.3 MMBTU/hr)
CS-STL-01	CS-066-02	NA	X	NA	Natural gas boiler/FO back-up (6.3 MMBTU/hr)
CS-STL-01	CS-066-03	NA	X	NA	Natural gas boiler (6.3 MMBTU/hr)
CS-STL-01	CS-066-04	NA	X	NA	Natural gas boiler (6.3 MMBTU/hr)
CS-STL-01	CS-111-03	NA	X	#1333	Natural gas boiler (6.3 MMBTU/hr)
CS-STL-01	CS-221-01	NA	X	NA	Natural gas boiler (3.3475 MMBTU/hr)
CS-STL-01	CS-221-02	NA	X	NA	Natural gas boiler (3.3475 MMBTU/hr)

X = Applicable NA = Not Applicable

COMPLIANCE REQUIREMENTS

I) Federally Enforceable Requirements

Permit Condition EU0090-001

10 CSR 10-6.070 and 40 CFR Part 60 Subpart Dc

Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

Emission Limitations:

None

Record Keeping:

The permittee shall collect annual fuel consumption readings for the **natural gas meter that includes the steam clean aircraft boiler**. This consumption data includes natural gas consumption from other sources (i.e. hot water heaters). These records shall be maintained by the permittee for a period of two years.

Monitoring:

None

Reporting:

None

Permit Condition EU0090-002

10 CSR 10-6.060

Air Construction Permits

1) Requirements of the Construction Permit Numbers: #0865, #1332, #1333 & #6358

Emission Limitations:

None

Record Keeping:

None

Monitoring:

None

Reporting:

None

2) Requirements of the Construction Permit Number: #1321

Emission Limitations:

- (1) The **existing chain grate coal-fired boiler** was removed.
- (2) The maximum hourly heat input of the **modified boilers** while burning coal is limited as follows:
 - (a) From April 1 to October 31 – 110.2×10^6 BTU/HR averaged over 24 hours.
 - (b) From November 1 to March 31 – 122.4×10^6 BTU/HR averaged over 24 hours.
- (3) The **sulfur content** of the coal burned shall not exceed one percent (1%).
- (4) **Sulfur dioxide emissions** are limited to 217.5 pounds per hour, and 1.76 pounds per million BTUs of hourly heat input while burning coal.

- (5) Nitrogen dioxide emissions are limited to 1.0 pounds per million BTU's of hourly heat input while burning coal.
- (6) Emissions testing was performed (1/18/85).
- (7) A post construction monitoring site for sulfur dioxide was established and operated for one (1) year.
- (8) A plan was submitted (8/12/85) for assuring continuing compliance with the nitrogen dioxide emission limitation above.
- (9) The ash content of the coal burned shall not exceed twelve (12) percent by weight.
- (10) Alternate fuels can be burned. (Including: natural gas, fuel oil, and off-spec. jet fuel.)

Record Keeping:

- (1) The permittee shall maintain monthly or daily as required records of the following:
 - (a) amount of coal burned daily
 - (b) sulfur content of the coal
 - (c) ash content of the coal
 - (d) heating value of the coal in BTU/lb
 - (e) The maximum hourly heat input of the modified boilers while burning coal:
- (2) Records shall be maintained for a sixty (60) month period.

What about other fuel use?

Monitoring:

Test method contained in 10 CSR 10-6.040(1) (ASTM D (3177-75)) or other director-approved method should be used to determine compliance with sulfur content of coal.

Reporting:

- (1) Monthly fuel usage and analysis reports shall be submitted to the local agency within 15 days of the end of each month, or as approved by the St. Louis County Air Pollution Control Program and the Missouri Department of Natural Resources Air Pollution Control Program. The reports shall include:
 - (a) amount of coal burned daily
 - (b) sulfur content of the coal
 - (c) ash content of the coal
 - (d) heating value of the coal in BTU/lb
 - (e) These reports are not required to be certified by a responsible official.
- (2) The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of the Emission Limitations.

10

EU0100

Depainting Operations

FIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL 1) & 2) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP	DESCRIPTION (for information only, this does not create any permit requirements)
MC-STL-01	MC-STL-01	X	Plantwide chemical depainting
NONE	DP-STL-01	X	Plantwide mechanical depainting

X = Applicable NA = Not Applicable

COMPLIANCE REQUIREMENTS

f) Federally Enforceable Requirements

Permit Condition EU0100-001

10 CSR 10-6.075 and 40 CFR Part 63, Subpart GG

Aerospace Manufacturing and Rework Facilities NESHAP (When 7 or more completed aerospace vehicles are depainted in a calendar year and when 6 or less completed aerospace vehicles are depainted in a calendar year this does not apply)

Emission Limitations:

- (1) On an average annual basis, no more than 26 gallons (or 190 pounds) of organic HAP containing chemical strippers per completed commercial aircraft depainted or no more than 50 gallons (or 360 pounds) of organic HAP containing chemical strippers per completed military aircraft depainted may be used for spot stripping and decal removal.
- (2) Nonchemical based depainting equipment shall be operated and maintained according to the manufacturer's specifications or locally prepared operating procedures. During periods of malfunctions, use substitute materials during the repair period which minimize organic HAP emissions. Substitute materials can be used for no more than fifteen (15) days annually, unless such materials are organic HAP-free.
- (3) Depainting operations that generate airborne inorganic HAP emissions from dry media blasting must comply with 63.746 (b)(4)(i) through (v).
- (4) Mechanical and hand sanding operations are exempt from the requirements of 63.746 (b)(4).

no controls,
80 63.746 (a)(1) & (a)(3)
NESHAP

where it says this? \Rightarrow 63.746 (c)(5)

Applicable over it more than 6... what is the regulatory basis for paying this? 363.746 (b)(3) 46 (a) 100% of total

Record Keeping:

(1) General

(a) Record for all chemical strippers used in the depainting operation:

1. The name of each chemical stripper
2. For spot stripping and decal removal, the volume of organic HAP containing chemical stripper or weight of organic HAP used, the annual average volume of organic HAP-containing stripper or weight of organic HAP used per aircraft, the annual number of aircraft stripped, and all data and calculations used.

(2) Mechanical Depainting

(a) If dry media blasting equipment is used to comply with the organic HAP emission limit specified in 63.746(b)(1), record:

1. The names and types of nonchemical based equipment; and
2. For periods of malfunction,
 - a. The nonchemical method or technique that malfunctioned;
 - b. The date that the malfunction occurred;
 - c. A description of the malfunction;
 - d. The methods used to depaint aerospace vehicles during the malfunction period;
 - e. The dates that these methods were begun and discontinued; and
 - f. The date that the malfunction was corrected.

(b) Record the pressure drop (either electronically or manually) once each operating shift that inorganic HAP containing primer or topcoat is spray applied.

1. The pressure drop records are deemed to be complete if 95% of the readings are recorded for all of the booths subject to this rule in any six (6) month period. If the last reading taken correctly prior to any group of missed readings and the first reading taken correctly after the same group of missed readings are both below the pressure drop limit, the missed readings are assumed to be below the pressure drop limit.
2. For this provision, a shift is an 8 hour period (12:00 midnight to 8:00 AM, 8:00 AM to 4:00 PM, and 4:00 PM to 12:00 midnight).

Monitoring:

None

Reporting:

(1) Submit a semiannual report that identifies:

(a) For periods of malfunctions of dry media blasting equipment:

1. The nonchemical method or technique that malfunctioned;
2. The date that the malfunction occurred;
3. A description of the malfunction;
4. The methods used to depaint aerospace vehicles during the malfunction period;
5. The dates that these methods were begun and discontinued; and
6. The date that the malfunction was corrected;

(b) All periods where a nonchemical depainting operation subject to 63.746 (b)(2) and (b)(4) for the control of inorganic HAP emissions was not

563.753(d) reporting
63.746(2) record keeping
THIS WHY IS UNDER "DEPAINTING OPERATIONS"?

and monthly volumes of each organic HAP containing

How long it lasted & if a substitute metal was used

immediately shut down when the pressure drop was outside the limit(s) specified by the filter or booth manufacturer or in locally prepared operational procedures;

- (c) A list of new and discontinued aircraft models depainted at the facility over the last 6 months and a list of the parts normally removed or depainting for each new aircraft model being depainted; and
 - (d) If the depainting operation has been in compliance for the semiannual period, a statement signed by a responsible company official that the operation was in compliance with the applicable standards.
- (2) Submit an annual report that identifies:
- (a) The average volume per aircraft of organic HAP-containing chemical strippers or weight of organic HAP used for spot stripping and decal removal operations if it exceeds the limits specified in 63.746 (b)(3); and
 - (b) The number of times the pressure drop limit(s) for each filter system were outside the limits specified by the filter or booth manufacturer or in locally prepared operating procedures.

EU0110
Emergency Generators

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL	DESCRIPTION (for information only, this does not create any permit requirements)
		1) 10 CSR 10-5.180: Emission of Visible Air Contaminants From Internal Combustion Engine	
NONE	EG-002-01	X	Diesel emergency generator
NONE	EG-002-02	X	Diesel emergency generator (in shed)
NONE	EG-009-01	X	Diesel emergency generator
NONE	EG-009-02	X	Diesel emergency generator (for pump)
NONE	EG-020-01	X	Diesel emergency generator
NONE	EG-026-01	X	Diesel emergency generator (for fire pump)
NONE	EG-029-01	X	Natural gas emergency generator
NONE	EG-029A-02	X	Natural gas emergency generator (200HP)
NONE	EG-033-01	X	Diesel emergency generator
NONE	EG-034-01	X	Diesel emergency generator
NONE	EG-045-01	X	Diesel emergency generator
NONE	EG-056-01	X	Diesel emergency generator (50 HP)
NONE	EG-064-01	X	Natural gas emergency generator (250 HP @ 1880 RPM)
NONE	EG-066-01	X	Natural gas emergency generator (250 HP)
NONE	EG-066-02	X	Diesel emergency generator (for fire pump)
NONE	EG-067-01	X	Diesel emergency generator
NONE	EG-101-01	X	Diesel emergency generator
NONE	EG-101A-01	X	Natural gas emergency generator
NONE	EG-102-01	X	Diesel emergency generator
NONE	EG-103-01	X	Diesel emergency generator
NONE	EG-106-01	X	Diesel emergency generator
NONE	EG-107-01	X	Diesel emergency generator
NONE	EG-110-01	X	Natural gas emergency generator
NONE	EG-111-01	X	Diesel emergency generator
NONE	EG-122-01	X	Diesel emergency generator
NONE	EG-220-01	X	Diesel emergency generator
NONE	EG-HQ-01	X	Diesel emergency generator

X = Applicable NA = Not Applicable

COMPLIANCE REQUIREMENTS

I) Federally Enforceable Requirements

Permit Condition EU0110-001
10 CSR 10-5.180 Emission of Visible Air Contaminants From Internal Combustion Engine

Emission Limitations:

No person shall cause or permit the emission of visible air contaminants from any internal combustion engine for more than ten (10) consecutive seconds at any one (1) time. Where the presence of uncombined water is the only reason for failure of an emission to meet the requirements of this regulation, the provisions of this regulation shall not apply.

Record Keeping:

None

Monitoring:

None

Reporting:

The permittee shall report to the St. Louis County Department of Health Air Pollution Control Section, 111 South Meramec, Clayton, MO, 63105 no later than thirty (30) days after the discovery of any exceedance of visible air contaminants requirements of Emission Limitations.

EU0120 Handling Of Hazardous Waste

FIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL	DESCRIPTION (for information only, this does not create any permit requirements)
		1) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP - Hazardous Waste Handling	
NONE	HW-STL-01	X	Plantwide handling of hazardous waste

X = Applicable NA = Not Applicable

COMPLIANCE REQUIREMENTS

I) Federally Enforceable Requirements

Permit Condition EU0120-001

10 CSR 10-6.075 and 40 CFR Part 63, Subpart GG

Aerospace Manufacturing and Rework Facilities NESHAP - Hazardous Waste Handling

Emission Limitations:

All waste that contains HAP, but is not subject to RCRA standards, shall be handled and transferred to or from containers, vats, vessels, and piping systems in such a manner that minimizes spills.

Record Keeping:

None

Monitoring:

None

Reporting:

None

EU0130

Hazardous Waste Shelter

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL 1) 40 CFR Part 63, Subpart DD and 10 CSR 10-6.075: Off-Site Waste NESHAP	DESCRIPTION (for information only, this does not create any permit requirements)
NONE	MS-027-04	N/A	Hazardous waste shelter

X = Applicable

NA = Not Applicable

COMPLIANCE REQUIREMENTS

~~I) Federally Enforceable Requirements~~

~~N/A~~

EU0140

Chemical Milling Maskants

FEDERAL

STATE

EIG POINT NUMBER	EMISSION UNIT NUMBER	1) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP - Chemical Milling Maskant	2) 10 CSR 10-5.330: Control of Emissions From Industrial Surface Coating Operations	3) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	1) 10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework Facilities	DESCRIPTION (for information only, this does not create any permit requirements)
ML-051-01	ML-051-01	X	NA	#6326	X	Large waterbased maskant line
ML-051-01	SB-051-01	X	NA	#6326	X	Maskant spray booth
NONE	ML-051-02	X	NA	NA	X	Small wasterbased maskant line

X = Applicable NA = Not Applicable

COMPLIANCE REQUIREMENTS

I) Federally Enforceable Requirements

Permit Condition EU0140-001

10 CSR 10-6.075 and 40 CFR Part 63, Subpart GG
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<i>Aerospace Manufacturing and Rework Facilities NESHAP – Chemical Milling Maskant</i>

Emission Limitations:

- (1) VOC emissions from chemical milling maskants shall be limited to no more than 160 grams of organic HAP per liter (1.3 lb/gal).
 - (a) This limit does not apply to:
 1. Touch-up of scratched surfaces or damaged maskant; or
 2. Touch-up of trimmed edges.
- (2) The permittee shall conduct the handling and transfer of chemical milling maskants to or from containers, tanks, vats, vessels, and piping systems in such a manner that minimizes spills.

Record Keeping:

Chemical milling maskant purchasing records including monthly amount purchased and VOC content shall be maintained.

Monitoring:

None

Reporting:

- (1) Semi-Annual Report
- (2) Annual Report

Permit Condition EU0140-002

10 CSR 10-6.060

<i>Air Construction Permits</i>
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1) Requirements of the Construction Permit Number: #6326

Emission Limitations:

Emissions are limited, on a twelve (12) month rolling average, to eight and one tenth (8.1) ton each of VOC and HAP.

Record Keeping:

- (1) Monthly records of all chemical milling maskants utilized in the maskant operations, including:
 - (a) The amounts of each material
 - (b) The VOC and HAP content of each material
 - (c) Calculations, which, demonstrate compliance with the emission limitation above.
 - (d) Records showing the twelve month rolling average of emissions of VOC and HAP.
 - (e) The records for the latest sixty (60) month period.

Monitoring:

None

Reporting:

an exceedance
Should the records indicate that a violation of any of the limits established in the emission limitation above has occurred, the permittee shall notify the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, by no later than the next working day.

This notification is not required to be certified by a responsible official.

II) State/Local Only Enforceable Requirements

Permit Condition EU0140-003

10 CSR 10-5.295

Control of Emissions From Aerospace Manufacture and Rework Facilities

Emission Limitations:

- (1) VOC emissions from chemical milling maskants shall be limited to no more than 160 grams of organic HAP per liter (1.3 lb/gal).
 - (a) This limit does not apply to:
 1. Touch-up of scratched surfaces or damaged maskant; or
 2. Touch-up of trimmed edges.
- (2) The permittee shall conduct the handling and transfer of chemical milling maskants to or from containers, tanks, vats, vessels, and piping systems in such a manner that minimizes spills.

Record Keeping:

Purchasing records including monthly amount purchased and VOC content shall be maintained.

Monitoring:

None

Reporting:

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of the VOC content requirements in Emission Limitations.

EU0150

Particulate Emitting Sources

FEDERAL

EIG POINT NUMBER	EMISSION UNIT NUMBER	1) 10 CSR 10-5.050 Restriction of Emission of Particulate Matter From Industrial Processes	2) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	DESCRIPTION (for information only, this does not create any permit requirements)
NONE	GB-027-02	X	NA	Walk-in grit blaster

X = Applicable NA = Not Applicable

COMPLIANCE REQUIREMENTS

I) Federally Enforceable Requirements

Permit Condition EU0150-001

10 CSR 10-5.050

Restriction of Emission of Particulate Matter From Industrial Processes

Emission Limitations:

(1) Units must meet one of the following limits:

- (a) The emission rate of 17.199 lb particulate matter/hour; or
- (b) The concentration of 0.100 grains/scf.

Record Keeping:

Maintain a copy of one-time compliance demonstration calculations.

Monitoring:

None

Reporting:

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than ten (30) days after the discovery of any exceedance of the particulate matter emission limit required under Emission Limitation.

EU0160

Chromic Acid Anodize Tank

FEDERAL

FIG POINT NUMBER	EMISSION UNIT NUMBER	1) 40 CFR Part 63, Subpart N and 10 CSR 10-6.075: Chrome NESHAP	DESCRIPTION (for information only, this does not create any permit requirements)
PT-027-05	IT-027-08A	X	Immersion tank 9 in the aluminum line

X = Applicable NA = Not Applicable

COMPLIANCE REQUIREMENTS

I) Federally Enforceable Requirements

Has this unit been sold to GKN?

Permit Condition EU0160-001

10 CSR 10-6.075 and 40 CFR Part 63 Subpart N

Chrome NESHAP

Emission Limitations:

- (1) The surface tension of the tank shall be maintained at or below 45 dynes/cm.
- (2) The permittee shall maintain and follow an operation and maintenance plan.

Record Keeping:

The hours of operation for the chrome anodize tank shall be recorded.

*Should this be incorporated by reference?
yes*

at least a copy included?

*15 REC'D
63-N*

*Does this unit do chrome electroplating?
or decorative electroplating?*

Is Emissions Unit No. EU0160 the same as IT-027-08A?

Requires use of chemical fume suppressant

Monitoring:

- (1) The surface tension shall be periodically monitored based on the alternate monitoring schedule from Table 2 of the operation and monitoring plan:

Table 2 Alternative Monitoring Requirements

Inspection Level	Time of Continuous Anodize Tank Operation at Less Than or Equal to 45 dynes/cm (1), (3)	Frequency of Surface Tension Readings (4)	Actions Required Based on Results of Surface Tension Reading
Level 1	0 to 40 hours	Twice a day	If the surface tension readings are less than or equal to 45 dynes/cm after 40 hours of operation, then proceed to Inspection Level 2.
Level 2	41 to 80 hours	Once a day	If the surface tension readings are less than or equal to 45 dynes/cm after 80 hours of operation, then proceed to Inspection Level 3.
Level 3	Greater than 80 hours	Once a week	If the surface tension readings are less than or equal to 45 dynes/cm, then remain at Inspection Level 3. (2)

Notes:

- {1} The time of continuous anodize tank operation is defined as accumulated time when the chromic acid anodize current is flowing.
- {2} If any reading is greater than 45 dynes/cm, then shut down the chromic acid anodize tank operation.
- {3} If the tank operation exceeds 40 hours of operation in one week, the sampling frequency will revert back to the original monitoring requirements until a new tank is required. (Table 1).
- {4} Day means only a day during which either the tank is operated or a day during which normal production operations at the facility are conducted, and week means Monday through Friday.
- (2) If the facility exceeds 40 operating hours in a week, the original monitoring requirements from Table 1 of the operation and maintenance plan must be used (These requirements may be implemented instead of the alternative monitoring requirements if the facility may exceed 40 operating hours in a week.):